

## **EXHIBIT 7**

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OUR REFERENCE	

April 5, 2019

## By Federal Express

Gerard Filitti, Esq.  
Osen LLC  
2 University Plaza, Suite 402  
Hackensack, New Jersey 07601

Re: Subpoenas to BNY Mellon in *Hake et al. v. Islamic Republic of Iran et al.*, No. 17-cv-114, and *Gill et al v. Islamic Republic of Iran*, No. 15-cv-02272

Dear Gerard:

I write in response to the non-party subpoenas served on The Bank of New York Mellon ("BNYM") in the *Gill* and *Hake* actions. In our effort to resolve the dispute between BNYM and the *Gill* and *Hake* plaintiffs regarding BNYM's compliance with the subpoenas, I enclose a protected disc containing a revised series of spreadsheets responsive to the subpoenas. (The password to unlock the disc is Hake-Gill-2018\*.) The revised spreadsheets address the alleged deficiencies that you raised in your March 20, 2019 email to me, and we believe that the new disclosures warrant the withdrawal of plaintiffs' pending motion to compel, as against BNYM, in *Hake et al. v. Credit Suisse A.G.*, No. 19-mc-24 (S.D.N.Y.).

The revised spreadsheets unredact all of the redacted fields in the spreadsheets that BNYM originally produced, including the six specific fields you referred to in your March 20 email and the fields containing SWIFT message data. As to the questions you raised in your March 20 email, the answers are as follows: (i) the 12 unpopulated fields referred to in your email were all originally empty, so no information was removed from the fields, which remain empty; (ii) the spreadsheets do, in fact, include transactions that were blocked, though the vast majority of transactions in the spreadsheets were not blocked; (iii) BNYM did search for SWIFT

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Gerard Filitti, Esq.

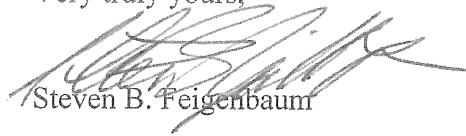
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messages in all of the SWIFT message series; and (iv) the phrase “FTD Iran Embargo” in the “Debiting Bank Name” column of the spreadsheets refers to how the funds in a given wire transfer were re-routed into a separate account called the “Iran Embargo Account.”

If you have any other questions, just let me know. But otherwise please let me know, as soon as possible before our deadline (April 19) for updating the Court, whether you believe there are any remaining issues for BNYM to address.

Very truly yours,



Steven B. Feigenbaum

SBF/  
Enclosure